

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

KELLY BLAND,

Plaintiff,

v.

1ST TEXAS HEALTH & LIFE LLC,

AARON HANSOME,

Defendants.

Case No.: 4:24-cv-01022

DEFENDANT AARON HANSOME’S PROPOSED SCHEDULING ORDER

TO THE HONORABLE JUDGE REED C. O’CONNOR AND MAGISTRATE JUDGE HAL R.
RAY, JR.:

Defendant Aaron Hansome, proceeding pro se, respectfully submits this Proposed Scheduling Order for the Court’s consideration.

1. Proposed Case Deadlines

Event	Proposed Deadline
Initial Disclosures (Rule 26(a)(1))	March 15, 2025
Amendment of Pleadings & Joinder of Parties	April 15, 2025
Plaintiff’s Expert Disclosure Deadline	May 15, 2025
Defendant’s Expert Disclosure Deadline	June 15, 2025
Discovery Cutoff	August 1, 2025
Dispositive Motions Deadline	September 1, 2025
Pretrial Disclosures	October 1, 2025
Pretrial Conference	October 15, 2025

Trial Date	November 2025 (subject to Court availability)
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2. Discovery Plan & Scope

Defendant intends to conduct discovery to establish:

- **Plaintiff’s History of Litigation and Financial Gain from TCPA Lawsuits**
 - Plaintiff’s prior TCPA settlements and lawsuits as they relate to a potential pattern of litigation for financial gain.
 - Plaintiff’s history of filing TCPA lawsuits and the potential use of the same phone number in over 20 cases.
 - Plaintiff’s reference to her extensive litigation history in demand letters and communications as a means of intimidation and coercion to extract settlements.
- **Use of a Single Phone Number Primarily for Litigation**
 - Whether Plaintiff’s phone number is primarily used for TCPA litigation rather than for personal purposes.
 - Whether Plaintiff has redacted this phone number in multiple lawsuits, preventing transparency and raising concerns about its use as a litigation tool.
 - Whether Plaintiff’s phone number qualifies as a **business line**, rather than a residential line, making it ineligible for TCPA protections under **47 U.S. Code § 227**.
- **Plaintiff’s Contact with Defendant**
 - Whether Plaintiff used a different identity in her interactions with Defendant, failing to disclose her prior demands and prior involvement.
 - Whether Plaintiff changed her last name due to marriage and resumed her threats months later under a different identity, without notifying Defendant of the name change, causing confusion and creating an undue burden.
 - Whether Plaintiff used identical settlement demand verbiage to her sister Kimberly Starling, who also threatened Defendant in pursuit of a settlement, indicating a formulaic litigation model for financial gain.

- Whether Plaintiff and her sister coordinated litigation tactics, as evidenced by identical wording in settlement demands and threats, raising concerns about **potential bad-faith litigation practices.**

3. Additional Considerations

- Defendant requests a reasonable discovery period given the complexity and importance of these issues.
- Defendant reserves the right to seek further discovery as new evidence emerges.

4. Conclusion

Defendant submits this proposed schedule in good faith and requests that the Court adopt it to allow for full and fair discovery.

Respectfully submitted,

Aaron Hansome

Aaron Hansome

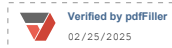
Pro Se Defendant

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CERTIFICATE OF SERVICE

I certify that on **02/25/2025**, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Additionally, a copy of this document has been sent via email to **Plaintiff Kelly Bland at kellybland516@gmail.com.**

Aaron Hansome

Aaron Hansome

Pro Se Defendant

